

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,

Plaintiff,

v.

FELICIA FRANKLIN, in her
individual and official capacities;
ALIEKA ANDERSON, in her
individual and official capacities;
GAIL HAMBRICK, in her
individual and official capacities;
and CLAYTON COUNTY,
GEORGIA,

Defendants.

Civil Action Number:
1:22-cv-04149-WMR

**DEFENDANT FELICIA FRANKLIN’S CONSENT MOTION FOR AN
EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF HER MOTION
FOR JUDGMENT ON THE PLEADINGS**

COMES NOW Defendant Felicia Franklin (“Defendant Franklin”) by and through her undersigned counsel and hereby moves for an extension of time to file her Reply in Support of her Motion for Judgment on the Pleadings [Doc. 44], through and including April 28, 2023. In support of this motion, Defendant Franklin respectfully show as follows:

Defendant Franklin filed her Motion for Judgment on the Pleadings [Doc. 44] on March 3, 2023. Plaintiff filed her Response in Opposition to Defendant Felicia Franklin's Motion for Judgment on the Pleading [Doc. 49] on March 31, 2023. Franklin's reply brief is currently due on or before April 14, 2023.

The request for an extension to April 28, 2023, is needed due to counsel's other conflicting deadlines and personal vacation time which took Defendant Franklin's counsel away from the practice of law during the first week of April. Counsel for Defendant Franklin has conferred with Plaintiff's counsel, and Plaintiff consents to Defendant Franklin's request for this extension. The Court has scheduled a hearing on Defendants Clayton County's and Gail Hambrick's Motion to Dismiss [Doc. 22], Defendant Anderson's Motion for Judgment on the Pleadings [Doc. 29], and Defendant Franklin's Motion for Judgment on the Pleadings [Doc. 44] for May 22, 2023, and this extension will not interfere with that scheduled hearing.

WHEREFORE, Defendant Franklin respectfully requests that she be granted an extension through and including April 28, 2023, to file her Reply in Support of her Motion for Judgment on the Pleadings. A proposed order is attached for the Court's convenience.

Respectfully submitted this 11th day of April, 2023.

/s/ Melissa A. Tracy
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CERTIFICATE OF COMPLIANCE

I hereby certify that the within and foregoing has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

/s/ Melissa A. Tracy
Melissa A. Tracy
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CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing **CONSENT MOTION FOR AN EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF HER MOTION FOR JUDGMENT ON THE PLEADINGS** in the above-styled civil action with the Clerk of Court by using the Court's CM/ECF system, which will automatically send notice of same to the attorneys of record.

This 11th day of April, 2023.

/s/ Melissa A. Tracy

Melissa A. Tracy

Georgia Bar No. 714477

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